

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

PAOLA DOMINGUEZ,

Plaintiff,

v.

MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC,

Defendant.

Case No. 3:23-cv-00175-KC

**NOTICE OF AGREEMENT REGARDING MEDIATOR**

In accordance with the Court's Scheduling Order, ECF No. 23, Plaintiff Paola Dominguez and Defendant Milberg Coleman Bryson Phillips Grossman, PLLC hereby submit to the Court that:

1. The parties have conferred to select a mediator.
2. The parties agree to the selection of Lance Harke of Upchurch Watson White & Max Mediation Group as mediator. Upchurch Watson White & Max Mediation Group regularly mediates Telephone Consumer Protection Act and pendant state telemarketing law cases such as this one.
3. On behalf of both parties, Defendant's counsel contacted Mr. Harke to determine his availability as mediator. Mr. Harke is available and willing to serve as a mediator in this matter.
4. The parties are scheduled to mediate this matter on April 10, 2024 at 11:00 am MST.

Dated: January 22, 2024

/s/ Paola Dominguez

Paola Dominguez  
pdomin14@gmail.com  
2316 Bill Howard Pl.  
El Paso, TX 79936  
Telephone: (915) 251-4955

*Plaintiff*

/s/ Daniel S. Blynn

Daniel S. Blynn (*pro hac vice*)  
dblynn@steptoe.com  
STEPTOE LLP  
1330 Connecticut Avenue, NW  
Washington, DC 20036  
Telephone: (202) 429-3000  
Facsimile: (202) 429-3902

Randi Kassan  
rkassan@milberg.com  
MILBERG, COLEMAN, BRYSON,  
PHILLIPS & GROSSMAN  
100 Garden City Plaza  
Telephone: (516) 741-5600

*Attorneys for Defendant*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of January, 2024, I have electronically filed a copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record and other CM/ECF participants. A copy also has been served via electronic mail pursuant to the parties' agreement on:

Paola Dominguez  
2316 Bill Howard Pl.  
El Paso, TX 79936  
Pdomin14@gmail.com

/s/ Daniel S. Blynn